United States Bankruptcy Court Southern District of Texas

#### **ENTERED**

November 03, 2021 Nathan Ochsner, Clerk

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

IN RE:	§	
	§	CHAPTER 11
FIELDWOOD ENERGY III LLC, et al.,	§	
	§	CASE NO. 20-33948 (MI)
Post-Effective Date Debtors. <sup>1</sup>	§	
	§	(Jointly Administered)

# STIPULATION REGARDING RESPONSE DEADLINE TO RYAN, LLC FEE APPLICATION

This Stipulation Regarding Response Deadline to Ryan, LLC Fee Application (the "Stipulation") is entered into by and between David M. Dunn, Plan Administrator (the "Plan Administrator") in the above-captioned case, and Ryan, LLC ("Ryan" and, together with the Plan Administrator, the "Parties"), by and through their respective counsel, with reference to the following facts:

WHEREAS, on October 12, 2021, Ryan filed its Final Fee Application of Ryan, LLC for Allowance of Compensation for Sevices Rendered and Reimbursement of Expenses Incurred

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The Post-Effective Date Debtors, along with the last four digits of each Post-Effective Date Debtor's federal tax identification numbers, as applicable, are: Fieldwood Energy III LLC (6778); Fieldwood Energy Offshore LLC (4494), Fieldwood Energy Inc. (4991), GOM Shelf LLC (8107), and FW GOM Pipeline, Inc. (8440). Fieldwood Energy III LLC, Fieldwood Energy Offshore LLC, and Fieldwood Energy Inc. are managed and operated by the Plan Administrator, whose primary mailing address is 16255 Ventura Blvd., Suite 440, Encino, CA, 91436, C/O of Province LLC. GOM Shelf LLC and FW GOM Pipeline, Inc. (collectively, the "Post-Effective Date FWE I Subsidiaries") are managed and operated by Jon Graham, as sole manager of each Post-Effective Date FWE I Subsidiary. The Debtors in the other nine pending chapter 11 cases (which continue to be jointly administered with the cases of the Post-Effective Date Debtors), each of which have either been dissolved or merged into other entities as of the Effective Date, consist of the following: Dynamic Offshore Resources NS, LLC (0158); Fieldwood Onshore LLC (3489); Fieldwood SD Offshore LLC (8786); Fieldwood Offshore LLC (2930); Bandon Oil and Gas GP, LLC (9172); Bandon Oil and Gas, LP (9266); Fieldwood Energy SP LLC (1971); Galveston Bay Pipeline LLC (5703); and Galveston Bay Processing LLC (0422).

Postpetition [Dkt. 2091] (the "Fee Application");

WHEREAS, on October 26, 2021, the Parties, together with certain other professionals retained by the Debtors in the Bankruprcy Cases, entered into a stipulation (the "October 26 Stipulation") [Dkt. 2103], pursuant to which, among other things, the Parties stipulated that the deadline to respond to the Fee Application is twenty-one (21) days from the date upon which Ryan served the Fee Application;

WHEREAS, on October 27, 2021, the Court signed the October 26 Stipulation, setting the deadline for any party-in-interest, including the Plan Administrator, to file and serve any response to the Fee Application at twenty-one (21) days from the date upon which the Fee Application was served (the "Response Deadline");

WHEREAS, the Parties have entered into discussions to resolve certain issues in the Fee Application, as identified by the Plan Administrator;

WHEREAS, the Parties have agreed, subject to approval of this Court, to stipulate to an additional fourteen (14) day extension of the Response Deadline solely as to the Plan Administrator;

NOW, THEREFORE, IT IS STIPULATED AND AGREED TO BY THE PARTIES, AND UPON APPROVAL BY THE COURT OF THIS STIPULATION, IT IS SO ORDERED AS FOLLOWS:

1. The above recitals are incorporated by reference herein with the same force and effect as if fully set forth hereinafter.

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2. The Response Deadline is extended through and including November 16, 2021, solely as to the Plan Administrator.

Signed: November 03, 2021

Marvin Isgur

United States Bankruptcy Judge

IN WITNESS WHEREOF, this Stipulation has been executed and delivered as of the day and year first below written.

Dated: November 2, 2021

MINTZ LEVIN COHN FERRIS GLOVSKY AND POPEO, P.C.

## /s/ Joseph R. Dunn

By: Joseph R. Dunn (*Pro Hac Vice*)
CA State Bar No. 238069
jrdunn@mintz.com
3580 Carmel Mountain Rd., Suite 300
San Diego, California 93210
T: (858) 314-1500
F: (858) 314-1501

-and-

Abigail V. O'Brient (*Pro Hac Vice*)
CA State Bar No. 265704
aobrient@mintz.com
2029 Century Park East, Suite 3100
Los Angeles, California 90067
T: (310) 586-3200
F: (310) 586-3202
Counsel for David M. Dunn, in his capacity as Plan Administrator

Dated: November 2, 2021

#### BELL NUNNALLY & MARTIN LLP

## /s/ Heather H. Jobe

By: Heather H. Jobe
Texas Bar No. 24048825
Troy Hales
Texas Bar No. 24099011
2323 Ross Ave.
Suite 1900
Dallas, TX 75201
T: (214) 740-1462
F: (214) 740-1499

Email: hjobe@bellnunnally.com thales@bellnunnally.com Counsel for Ryan, LLC